

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**Metacluster LT, UAB,**

**Plaintiff,**

**v.**

**Bright Data Ltd.,**

**Defendant.**

**Civil Action No.**

**2:22-cv-00011-JRG-RSP**

**JURY TRIAL DEMANDED**

**JOINT MOTION TO ENTER  
AGREED PROTECTIVE ORDER**

The parties respectfully request that the Court enter the proposed Protective Order attached as Exhibit A.

Dated: October 17, 2022

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**CERTIFICATE OF CONFERENCE**

The undersigned certifies that, on October 17, 2022, he met and conferred with counsel for Defendant and Defendant agrees to the relief requested herein.

s/Steven Callahan  
STEVEN CALLAHAN

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on October 17, 2022. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

s/Steven Callahan  
STEVEN CALLAHAN